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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT GRANTING
DISCONNECTION OIL SETTLEMENT
MOTION**

[Relates to Dkt. No. 4665]

Hearing Date: December 11, 2019
Hearing Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: December 4, 2019
4:00 p.m. (Pacific Time)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (the “**Case**
8 **Management Order**”), that the Court enter an order by default on the *Debtors’ Motion for an Order*
9 *(I) Approving Settlement Agreement Resolving Service Disconnection OII and (II) Granting Related*
10 *Relief* filed by the Debtors on November 11, 2019 [Dkt. No. 4665] (the “**Motion**”).

11 **RELIEF REQUESTED IN THE MOTION**

12 The Motion seeks entry of an order approving the amended settlement agreement, dated
13 May 9, 2019 (the “**Settlement Agreement**”), by and among the Utility and the Utility Enforcement
14 Branch of the Consumer Protection and Enforcement Division (“**CPED**”) of the California Public
15 Utilities Commission (“**CPUC**”) resolving the Disconnection OII (as defined in the Motion).

16 A proposed order (the “**Proposed Order**”) was attached as **Exhibit A** to the Motion. The
17 order being submitted is different from the Proposed Order attached to the Motion in that the reference
18 to a hearing being held has been deleted.

19 **NOTICE AND SERVICE**

20 A *Notice of Hearing on Debtors’ Motion for an Order (I) Approving Settlement*
21 *Agreement Resolving Service Disconnection OII and (II) Granting Related Relief* was filed concurrently
22 with the Motion on November 11, 2019 [Dkt. No. 4667] (the “**Notice of Hearing**”). The Motion, its
23 supporting declaration of Rakesh Nigam, and the Notice of Hearing were served as described in the
24 Certificate of Service of Sonia Akter filed on November 15, 2019 [Dkt. No. 4763]. The deadline to file
25 responses or oppositions to the Motion has passed, and no responses or oppositions have been filed with
26 the Court or received by counsel for the Debtors.

DECLARATION OF NO RESPONSE RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller & Benvenutti LLP, co-counsel for the Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: December 5, 2019

**WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP**

/s/ Thomas B. Rupp

Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession